

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GREGORY BOUTCHARD and SYNOVA  
ASSET MANAGEMENT, LLC, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

KAMALDEEP GANDHI, YUCHUN  
MAO a/k/a BRUCE MAO, KRISHNA  
MOHAN, TOWER RESEARCH CAPITAL  
LLC, and JOHN DOE Nos. 1 – 5,

Defendants.

Case No.: 1:18-cv-07041

Hon. John J. Tharp, Jr.

**CLASS PLAINTIFFS' MOTION FOR EXCESS PAGES FOR THEIR MEMORANDUM  
OF LAW IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT WITH TOWER RESEARCH CAPITAL LLC**

Plaintiffs Gregory Boutchard and Synova Asset Management, LLC (collectively, "Class Plaintiffs") respectfully move this Court for excess pages for their memorandum of law in support of preliminary approval of their class action settlement with Defendant Tower Research Capital LLC ("Tower"). In support of this motion, Class Plaintiffs state as follows:

1. On January 25, 2021 the Court ordered (1) Class Plaintiffs to file their motion for preliminary approval by January 29, 2021, (2) that any objections are due no later than February 19, 2021, and (3) a telephonic status hearing remains scheduled for February 25, 2021 at 10 a.m.
2. To fully address the arguments relating to preliminary approval of the Settlement, Class Plaintiffs seek leave to file a 30 page memorandum in support of their motion for preliminary approval, which is in excess of the 15-page limit set forth in Local Rule 7.1. Plaintiffs believe 30 pages would allow them to address as issues in way that is concise and does not prejudice Class Plaintiffs and the Class.

3. Class Plaintiffs have contacted Tower regarding this motion. Tower consents to the relief sought herein.

**WHEREFORE**, Class Plaintiffs respectfully move this Court for an Order granting Class Plaintiffs leave to file a 30-page memorandum in support of their motion for preliminary approval.

Respectfully submitted,

Dated: January 29, 2021  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

/s/ *Vincent Briganti*

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*Additional Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on the date shown below he caused the CLASS PLAINTIFFS' MOTION FOR EXCESS PAGES FOR THEIR MEMORANDUM OF LAW IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH TOWER RESEARCH CAPITAL LLC to be electronically filed with the Clerk for the U.S. District Court for the Northern District of Illinois, which will send a notification and a copy of the document to all counsel of record.

Dated: January 29, 2021

/s/ *Vincent Briganti*  
*Counsel for Plaintiffs*